

Safety Review Committee

November 21, 2008

10:00 AM – 12:00 PM

Minutes

Committee Member	Representing	Present
Banda, Michael J.	Computing Sciences Directorate	X
Bello, Madelyn	Human Resources Advisor	X
Blodgett, Paul M.	Environment, Health and Safety Division	X
Dubon, Oscar	Materials Sciences Division	X
Francino Puget, Maria Pilar	Genomics Division	X
Kadel, Richard W.	Physics Division	X
Kostecki, Robert	Environmental Energy Technologies Division	X
Leitner, Daniela	Nuclear Science Division	X
Li, Derun	Accelerator & Fusion Research Division	X
Lucas, Donald	Safety Review Committee Chair	X
Lukens Jr., Wayne W.	Chemical Sciences Division	X
Martin, Michael C.	Advanced Light Source Division	X
Nakagawa, Seiji	Earth Sciences Division	X
Ohearn, Jerry	Facilities Division	
Petzold, Christopher J.	Physical Biosciences Division	X
Sopher, Ted	Information Technology Division	X
Taylor, Scott E.	Life Sciences Division	X
Thomas, Patricia M.	Safety Review Committee Secretary	X
Twohey, Daniel	Directorate/Operations	X
Wong, Weyland	Engineering Division	X

Others Present: Richard DeBusk, Michelle Flynn, Keith Gershon, Julie Henderson, Michael Kritscher, Peter Lichty, Larry McLouth, Mike Ruggieri, Janice Sexson, Patrick Thorson, Bill Wells

Chairman's Comments – Don Lucas

- **Minutes** of the October 17th meeting were approved with minor corrections.
- **MESH Status** –No Management of Environmental Safety and Health (MESH) review reports were completed by the November meeting. They need to be finished by the end of the month. MESH reports are part of the Self-Assessment process, and were included in the McCallum-Turner review report as a Noteworthy Practice. Don Lucas asked MESH Team Leaders to give Divisions a deadline for completing their factual accuracy reviews.

PUB-3000 Minor Changes – John Seabury and Bill Wells

Minor changes to PUB-3000, Chapter 6 Safe Work Authorizations have been posted in the e-room. John Seabury has been making small continuous improvement updates since 2000.

Section 6.3, Appendix E Temporary Work Authorizations has been clarified to indicate that Division Directors may delegate signature authority for Activity Hazard Documents (AHDs) and Temporary Work Authorizations. The delegation to the designee should be in writing (e-mail is acceptable) and sent to Environment, Health and Safety (EHS) Division so they can program the correct signatory into the AHD database.

Section 6.3, Appendix B, Formal Authorizations has been updated to delete the reference to the University of California Human Subjects committee. LBNL has its own committee now.

Bill Wells will post other minor policy changes on the e-room.

PUB-3000, Chapter 6 Safe Work Authorizations, Appendix B Formal Authorizations: Proposed AHD requirement for electrical hazards – Keith Gershon

Keith Gershon proposed requiring AHDs for energized electrical work, such as testing, measuring, and verification, involving potential exposure to voltages equal to or greater than 50 V AC or DC and current equal to or greater than 5 mA. There will be a workbook and an AHD schedule. The same requirements would apply to Subcontractor Job Hazards Analyses (JHAs). The Principal Investigator and the Electrical Safety Engineer will sign the authorization. For the Subcontractor JHA, the requirement for the workbook is triggered by a questionnaire. Supervision of vendor/subcontractor work at least once a day is also required.

An AHD could cover the scope of work for electrical technicians. It would be completed by the Line supervisor and the employee. The AHD will be generated by the organization that will be authorizing the work. There were questions about how the AHD requirement would differ from the existing Individual JHAs for the technicians. EHS0249 is a required course for qualified Electronics Technologists. It is not an appropriate class for workers outside this job classification, and is not offered to them. Qualified Electrical Workers have more training than just one LBNL class. An Individual JHA requiring one training class and a few controls was not enough. A single AHD can authorize multiple workers doing the same tasks. The AHD will allow the supervisor to set limits on what the employees are authorized to do. It will describe the type of equipment. An AHD that is used to authorize electrical exposures will contain an electrical hazard schedule, similar to other hazard schedules that are already used with AHDs. A qualified person should be able to answer the questions in the schedule. The Electrical Safety Workbook is for subcontractors / vendors, as a supplement to their safety plans of Subcontractor JHA. A qualified person should be able to answer the questions in the workbook.

Committee members had significant questions about how the AHD process would work. There were questions about how the supervisor should evaluate what equipment should be included in the AHD. There were questions about how long it would take to approve an AHD. It would be similar to the approval process for a temporary work authorization. There were questions about the time frame for implementation. There are three Engineering Division supervisors that would have a lot of work to do to write the AHDs. We don't know how many will be required. The Corrective Action Plan item was due two months ago. The policy could be published in December, and effective June 30th. The Corrective Action Plan from the Health Safety and Security (HSS) review may also impact the availability of resources. There are concerns about using a workbook and processes similar to the Subcontractor JHA. Some researchers have not been able to get equipment fixed since the Subcontractor JHA requirement became effective. Some Principal Investigators will need help from a Subject Matter Expert. Education will be needed at many levels to prevent miscommunication of the requirements. There were questions about how much EHS and Safety Coordinator involvement will be needed. Committee members concluded that a pilot program would be needed to work out the details of the process.

Don Lucas asked for a vote to move forward with a pilot program. It was approved by a consensus of all committee members present. There was a question about whether the pilot program would include subcontractors. Don Lucas said that further definition of the scope of the pilot program is needed.

PPE Policy Discussion – Don Lucas

It is within the purview of the Lab Director, delegated to the Chief Operating Officer, to issue safety policy directly without review by the Safety Review Committee (SRC). The role of the SRC is to provide advice and comment. Lab Management issued an interim policy that allowed designation of areas with reduced Personal Protective Equipment (PPE) requirements or where food consumption would be allowed within technical areas. There have been concerns that the way some groups were starting to implement this policy would not provide adequate protection. Jim Krupnick, Paul Alivisatos, Howard Hatayama, and Don Lucas discussed the policy at a Division Director's meeting. The discussion took about an hour and a half. There were concerns about the balance between the need for urgency and the need for obtaining compliance with the policy. It was decided to revise the policy to require minimum PPE in technical areas, and provide a process by which requests for exceptions could be submitted to the EHS Director for consideration and approval. An implementation date of February 2, 2009 was proposed.

Committee members had many questions about the details of the policy and its implementation. What is a "technical area"? What PPE would be required for soldering under a microscope? Will exceptions actually be approved? (The answer was yes, if there is documentation of appropriate hazard controls that provide equivalent protection. The Division's EHS Liaison should evaluate requests and provide an opinion letter.) There were concerns about how the policy would be communicated. Where would the official policy be posted? Would there be a person in charge of communicating the

policy? Some Divisions have been receiving conflicting instructions from different EH&S personnel. The Chemical Hygiene and Safety Plan will become a controlled document to provide assurance that the contents have been officially approved. The Chemical Hygiene and Safety Plan needs to be coordinated with PUB-3000 so there are no conflicting requirements. Distribution of the policy has been uneven. There needs to be a defined process. The interim policy will be withdrawn. People were confused about the hazard and PPE signs. The new policy will not allow individual risk judgments about when PPE is needed.

Committee members would like to discuss “Lessons Learned” from this policy development process at the annual meeting with the Lab Director.

LBNL’s Next Generation Environmental Management System – Patrick Thorson

LBNL’s existing Environmental Management System (EMS) is about 5 years old. The relevant Department of Energy (DOE) order (450.1A) on EMS’ has changed in response to a new Presidential executive order. The EMS must be integrated with ISM and DOE goals. The EMS will be consistent with ISO 14001 standards. The scope will be broad. It includes nanomaterials, reducing greenhouse gasses and generation of toxic substances, energy conservation, transportation management, sustainability, preventing wildland fires, etc. DOE has set some target goals in areas such as energy conservation and transportation management. For example, DOE requires reduction of energy intensity by 30% by 2015, and building design and remodel projects in excess of \$5 million must meet “LEED Gold” criteria. LBNL can set its own target goals in most areas. There were questions about how implementation will be funded.

The EMS must be implemented and validated by June 2006. In addition to the integration with ISM, the requirements include an audit of compliance programs, a Senior Management policy statement in the EMS plan, and an third party audit of the entire EMS plan. EHS, Facilities, and Procurement will administer most of the new requirements, though EHS will be looking to all Divisions to find opportunities to demonstrate progress.

An example of an existing goal is to reduce diesel particulate emissions by at least 5% a year until 2015 from busses and generators. The Lab leases its busses leased from the General Services Administration (GSA). The route they travel is demanding, so some of the lower emission busses on the market cannot be used here and GSA currently has a limited number of models available. The metrics on emergency generator emissions are taken from manufacturers’ certifications. We are also trying to reduce petroleum consumption by at least 2% per year. Progress on all EMS target is reviewed annually. Other programs may be targeted for trending, such as use of energy-efficient fume hoods. Updating the EMS will initiate needs to update the LBNL and Division Integrated Safety Management Plans and PUB-3000.

Information on Safety Glasses – Peter Lichty

There are different types of safety eyewear that are appropriate for different uses, including goggles that seal against the face to prevent exposure to hazardous substances and glasses that can be worn over prescription glasses. Employees can get free prescription safety glasses from Health Services that are impact resistant and have side shields. LBNL is looking for a better outside vendor because the cost to the Lab of \$120 - \$170 a pair is significant. Choices are not limited to glasses on a list, but they must meet safety standards. Dr. Lichty is looking at funding sources and distribution methods. People would like better information through e-buy. There have been concerns about the delay in getting laser eye exams. It is hard to find a qualified optometrist, and some people do not show up for their appointments.

The meeting was adjourned at 11:45 AM

Respectfully submitted, Patricia M. Thomas, SRC Secretary